

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION

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<i>In re</i>		)	
		)	
Lisa M. Maigret,		)	Chapter 13
		)	Case No. 13-30023-HJB
		)	
Debtor.		)	
<hr/>		)	

TO THE HONORABLE BANKRUPTCY JUDGE BOROFF:

DEBTOR'S OBJECTION TO CLAIM OF MOMA FUNDING, LLC

COMES NOW, Lisa M. Maigret, the Debtor, by and through her counsel, George E. Bourguignon, Jr., and object to the claim of MOMA Funding, LLC filed as claim #9 in this chapter 13 case, pursuant to 11 U.S.C. § 502(b), Fed. R. Bankr. P. 3001, and MLBR 3015-1, Appendix 13-13. In support of the same, she states:

1. The Claim has no documentation or support that the Claimant is the rightful owner of the debt/claim described. There are no documents presented that support the representation that the account was transferred to the purported "assignor," namely, Elite Financial Services from the original creditor. In addition, There are no documents presented that support the representation that the account was transferred from the purported "assignor," namely, Elite Financial Services, to the Claimant. There are also no account statements provided that show any charges made, which further supports that the Claimant is not the rightful owner. Thus, there is not sufficient evidence that the Claimant is the rightful owner of the debt associated with the Claim.

2. There is no written authorization provided granting the agent, Quantum3 Group, to act for the Claimant.
3. For these reasons, the instant Objection should be sustained.

Dated: 11 March 2013

By: /s/ George E. Bourguignon, Jr.  
George E. Bourguignon, Jr., Esq.  
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#### CERTIFICATE OF SERVICE

The undersigned certifies that this document and the attachment was filed with the Court in the manner appropriate for automated service of true electronic images to all ECF Registrants in this Case or Proceeding, including the panel trustee and the US trustee and on the Claimant itself by causing it to be mailed by first class mail on 11 March 2013 with postage prepaid and return address provided, unless Claimant received notice through the ECF system, to:

Quantum3 Group LLC as agent for  
MOMA Funding, LLC  
P.O. Box 788  
Kirkland, WA 98083

Dated: 11 March 2013

By: /s/ George E. Bourguignon, Jr.

NOTICE PURSUANT TO UNITED STATES BANKRUPTCY COURT, DISTRICT  
OF MASSACHUSETTS, STANDING ORDER 10-1

YOU ARE NOTIFIED that any response to this Objection must be filed with the Court within 30 days of the filing of this Objection.